

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
*Executive Director*

*Southern District of New York*  
Jennifer L. Brown  
*Attorney-in-Charge*

February 28, 2022

**VIA ECF**

The Honorable Lewis J. Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Lawrence Ray  
20 Cr. 110 (LJL)**

Dear Judge Liman:

We write on behalf of Mr. Ray in accordance with the Court order that the parties meet and confer on a proposed summary of the case to be read to prospective jurors during jury selection. Dkt. 387. The parties exchanged proposed drafts of their respective summaries of the case. After meeting and conferring, the parties could not agree on a joint proposal.

The summary of the case presented to the jury by the Court is intended to be a neutral presentation of the case, not an opening statement for the government or the defense. In contrast to the government's proposal, Mr. Ray's proposed summary briefly identifies the salient factual allegations of the indictment necessary to ensure the jury is fair and impartial, as directed by the Court. Ex. A. Additional details regarding each count as well as the people and places involved in the case will be covered at other points in voir dire and need not be included in the summary of the case. For these reasons, Mr. Ray respectfully requests that the Court rely on the defense's proposed summary of the case during jury selection.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/

Marne L. Lenox, Esq.  
Peggy Cross-Goldenberg, Esq.  
Allegra Glashausser, Esq.  
Neil P. Kelly, Esq.

*Counsel for Lawrence Ray*

cc: Counsel of record

# EXHIBIT A

### **Lawrence Ray's Proposed Summary of the Case for Jury Selection**

This is a criminal case brought by the United States Attorney's Office for the Southern District of New York against Lawrence Ray. The prosecution alleges that Mr. Ray engaged in a racketeering conspiracy with others, including Isabella Pollok, to commit different state and federal crimes. Mr. Ray is charged with agreeing with other people to encourage certain individuals to travel in order to landscape his stepfather's yard and engage in unlawful sexual activity. The government further alleges that Mr. Ray and others unlawfully took money from individuals who admitted to harming Mr. Ray and others, including by poisoning Mr. Ray and others and participating in a conspiracy against Mr. Ray. The government also alleges that Mr. Ray concealed the source of this money to avoid state and federal reporting requirements, and intentionally failed to pay federal income taxes.

Mr. Ray has pled not guilty to all charges. He is presumed innocent. Before Mr. Ray can be found guilty on any charge, the jury must find that the government has proven every element of the alleged crime beyond a reasonable doubt.